

Pillsbury Winthrop Shaw Pittman LLP Two Houston Center 909 Fannin, Suite 2000 | Houston, TX 77010-1018 | tel 713.276.7600 | fax 713.276.7673

Hugh M. Ray, III tel: +1.713.276.7661 hugh.ray@pillsburylaw.com

September 12, 2023

## VIA ECF

The Honorable Katherine Polk Failla United States District Court Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square, Room 2103 New York, NY 10007



Re: Huzhou Chuangtai Rongyuan Investment Management Partnership, et al. v. Hui

*Qin*, Case No. 21 Civ. 9221 (KPF)

Dear Judge Failla:

This letter is submitted jointly on behalf of counsel for Petitioners and Respondent. The parties have continued to negotiate an ESI Stipulation, including exchanging further redlined drafts of the ESI Stipulation.

Circumstances beyond either party's control have taken time away from the negotiation process to submit the ESI Stipulation by today's extended deadline. Accordingly, the parties respectfully request that the deadline for submitting an ESI Stipulation be extended to September 14, 2023 in order to allow additional time for the parties to address issues related to the ESI Stipulation.

Respectfully submitted,

/s/ Hugh M. Ray, III Hugh M. Ray, III

cc: All counsel of record (via ECF)

Application GRANTED. The deadline by which the parties must jointly file a Stipulation Regarding Electronically Stored Information (ESI) is hereby ADJOURNED to **September 14**, 2023. The parties are advised that, absent extenuating circumstances, the Court is unlikely to grant further of extensions of this deadline.

The Clerk of Court is directed to terminate the motion at docket entry 277.

Dated: September 13, 2023

New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA UNITED STATES DISTRICT JUDGE

Katherin Palle Fails